Section 1. Registration Information

Source Identification

Facility Name:	American Spraytech LLC
Parent Company #1 Name:	
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	Revised PHA / Hazard Review due to process change (40 CFR 68.190(b)(5))
Description:	
Receipt Date:	15-Oct-2020
Postmark Date:	15-Oct-2020
Next Due Date:	15-Oct-2025
Completeness Check Date:	15-Oct-2020
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0019 0134
Other EPA Systems Facility ID:	NJD035328913
Facility Registry System ID:	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	137135237
Parent Company #1 DUNS:	
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	205 Meister Avenue
Street 2:	
City:	North Branch
State:	NEW JERSEY
ZIP:	08876
ZIP4:	
County:	SOMERSET

Facility Latitude and Longitude

Latitude (decimal):	40.605556
Longitude (decimal):	-074.715556
Lat/Long Method:	Interpolation - Digital map source (TIGER)
Lat/Long Description:	Plant Entrance (General)
Horizontal Accuracy Measure:	50
Horizontal Reference Datum Name:	North American Datum of 1983

Source Map Scale Number:

Owner or Operator

Operator Name:	American Spraytech LLC
Operator Phone:	(908) 725-6060

Mailing Address

Operator Street 1:	205 Meister Avenue
Operator Street 2:	
Operator City:	North Branch
Operator State:	NEW JERSEY
Operator ZIP:	08876
Operator ZIP4:	
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Mr. Allen Lalwani
RMP Title of Person or Position:	President
RMP E-mail Address:	

Emergency Contact

Emergency Contact Name:	Mr. Allen Lalwani
Emergency Contact Title:	President
Emergency Contact Phone:	(908) 725-6060
Emergency Contact 24-Hour Phone:	(201) 675-4570
Emergency Contact Ext. or PIN:	
Emergency Contact E-mail Address:	alalwani@americanspraytech.com

Other Points of Contact

Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	
Facility or Parent Company WWW Homepage Address:	

Local Emergency Planning Committee

LEPC:	Branchburg Twp LEPC

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	268
FTE Claimed as CBI:	

Covered By

OSHA PSM :	Yes
EPCRA 302 :	Yes

CAA Title V:
Air Operating Permit ID:

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	04-Feb-2020
Last Safety Inspection Performed By an External Agency:	State environmental agency

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name:	Peter R. Jordan
Preparer Phone:	(215) 317-1562
Preparer Street 1:	225 Pine Glen Road
Preparer Street 2:	
Preparer City:	Langhorne
Preparer State:	PENNSYLVANIA
Preparer ZIP:	19047
Preparer ZIP4:	
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

Confidential Business Information (CBI)

CBI Claimed:
Substantiation Provided:
Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents: See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

Process Chemicals

Process ID:	1000112291
Description:	Hydrocarbon Systems
Process Chemical ID:	1000140334
Program Level:	Program Level 3 process
Chemical Name:	Propane
CAS Number:	74-98-6
Quantity (lbs):	90000
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000112291
Description:	Hydrocarbon Systems
Process Chemical ID:	1000140335
Program Level:	Program Level 3 process
Chemical Name:	Butane
CAS Number:	106-97-8
Quantity (lbs):	100000
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000112291
Description:	Hydrocarbon Systems
Process Chemical ID:	1000140336
Program Level:	Program Level 3 process
Chemical Name:	Isobutane [Propane, 2-methyl]
CAS Number:	75-28-5
Quantity (lbs):	100000
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000112291
Description:	Hydrocarbon Systems
Process Chemical ID:	1000140337
Program Level:	Program Level 3 process
Chemical Name:	Difluoroethane [Ethane, 1,1-difluoro-]
CAS Number:	75-37-6
Quantity (lbs):	155000
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000112291
Description:	Hydrocarbon Systems
Process Chemical ID:	1000140338
Program Level:	Program Level 3 process
Chemical Name:	Methyl ether [Methane, oxybis-]
CAS Number:	115-10-6
Quantity (lbs):	60000
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000112292
Description:	Warehouse Storage
Process Chemical ID:	1000140339
Program Level:	Program Level 3 process
Chemical Name:	Propane

CAS Number:	74-98-6
Quantity (lbs):	322000
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000112292
Description:	Warehouse Storage
Process Chemical ID:	1000140340
Program Level:	Program Level 3 process
Chemical Name:	Butane
CAS Number:	106-97-8
Quantity (lbs):	640000
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000112292
Description:	Warehouse Storage
Process Chemical ID:	1000140341
Program Level:	Program Level 3 process
Chemical Name:	Isobutane [Propane, 2-methyl]
CAS Number:	75-28-5
Quantity (lbs):	400000
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000112292
Description:	Warehouse Storage
Process Chemical ID:	1000140342
Program Level:	Program Level 3 process
Chemical Name:	Difluoroethane [Ethane, 1,1-difluoro-]
CAS Number:	75-37-6
Quantity (lbs):	302000
CBI Claimed:	
Flammable/Toxic:	Flammable

Process ID:	1000112292
Description:	Warehouse Storage
Process Chemical ID:	1000140343
Program Level:	Program Level 3 process
Chemical Name:	Methyl ether [Methane, oxybis-]
CAS Number:	115-10-6
Quantity (lbs):	200000
CBI Claimed:	
Flammable/Toxic:	Flammable

Process NAICS

Process ID:	1000112291
Process NAICS ID:	1000113624
Program Level:	Program Level 3 process
NAICS Code:	325998
NAICS Description:	All Other Miscellaneous Chemical Product and Preparation Manufacturing

Process ID:	1000112292
Process NAICS ID:	1000113625
Program Level:	Program Level 3 process
NAICS Code:	325998
NAICS Description:	All Other Miscellaneous Chemical Product and Preparation Manufacturing

Section 2. Toxics: Worst Case

No records found.

Section 3. Toxics: Alternative Release

No records found.

Section 4. Flammables: Worst Case

Flammable Worst ID: 1000068200

Model Used:	EPA's RMP*Comp(TM)
Endpoint used:	1 PSI

Passive Mitigation Considered

Blast Walls:	
Other Type:	

Flammable Worst ID: 1000068201

Model Used:	EPA's RMP*Comp(TM)
Endpoint used:	1 PSI

Passive Mitigation Considered

Blast Walls:	
Other Type:	

Section 5. Flammables: Alternative Release

Flammable Alter ID: 1000063856

Model Used:	EPA's RMP*Comp(TM)

Passive Mitigation Considered

Dikes:	
Fire Walls:	
Blast Walls:	
Enclosures:	
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Excess Flow Valve:	Yes
Other Type:	

Section 6. Accident History

No records found.

Section 7. Program Level 3

Description

This section applies to the hydrocarbon systems.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000119639
Chemical Name:	Propane
Flammable/Toxic:	Flammable
CAS Number:	74-98-6
Process ID:	1000112291
Description:	Hydrocarbon Systems
Prevention Program Level 3 ID:	1000095819
NAICS Code:	325998
Prevention Program Chemical ID:	1000119641
Chemical Name:	Isobutane [Propane, 2-methyl]
Flammable/Toxic:	Flammable
CAS Number:	75-28-5
Process ID:	1000112291
Description:	Hydrocarbon Systems
Prevention Program Level 3 ID:	1000095819
NAICS Code:	325998
Prevention Program Chemical ID:	1000119642
Chemical Name:	Difluoroethane [Ethane, 1,1-difluoro-]
Flammable/Toxic:	Flammable
CAS Number:	75-37-6
Process ID:	1000112291
Description:	Hydrocarbon Systems
Prevention Program Level 3 ID:	1000095819
NAICS Code:	325998
Prevention Program Chemical ID:	1000119640
Chemical Name:	Butane
Flammable/Toxic:	Flammable
CAS Number:	106-97-8
Process ID:	1000112291
Description:	Hydrocarbon Systems
Prevention Program Level 3 ID:	1000095819
NAICS Code:	325998

Prevention Program Chemical ID:	1000119643
Chemical Name:	Methyl ether [Methane, oxybis-]
Flammable/Toxic:	Flammable
CAS Number:	115-10-6

Process ID:	1000112291
Description:	Hydrocarbon Systems
Prevention Program Level 3 ID:	1000095819
NAICS Code:	325998

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	10-Feb-2020

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	04-Sep-2019

The Technique Used

What If:	
Checklist:	
What If/Checklist:	Yes
HAZOP:	
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	19-Sep-2019

Major Hazards Identified

Toxic Release:	
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	
Earthquake:	
Floods (Flood Plain):	Yes
Tornado:	Yes
Hurricanes:	Yes
Other Major Hazard Identified:	

Process Controls in Use

Vents:	
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	
Backup Pump:	
Grounding Equipment:	Yes
Inhibitor Addition:	
Rupture Disks:	
Excess Flow Device:	Yes
Quench System:	
Purge System:	
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	
Fire Walls:	
Blast Walls:	
Deluge System:	Yes
Water Curtain:	
Enclosure:	Yes
Neutralization:	
None:	
Other Mitigation System in Use:	Deflagration venting and suppression systems

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	
Change Process Parameters:	
Installation of Process Controls:	
Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	
None Recommended:	
None:	Yes

Other Changes Since Last PHA or PHA Update:

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	14-Sep-2020

Training

Training Revision Date (The date of the most recent review or revision of training programs):	10-Dec-2019

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	
Demonstration:	
Observation:	
Other Type of Competency Testing Used:	

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	18-Feb-2020
Equipment Inspection Date (The date of the most recent equipment inspection or test):	03-Sep-2020
Equipment Tested (Equipment most recently inspected or tested):	Fenwal Deflagration Suppression System

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	16-Sep-2020
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	10-Dec-2019

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	10-Jul-2020

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	10-Dec-2019
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	31-Jan-2020

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	11-Apr-2017
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	11-Apr-2017

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	10-Dec-2019

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	24-Feb-2020

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	01-Jan-2020
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	31-Dec-2019

Confidential Business Information

CBI Claimed:

Description

This section applies to the warehouse storage area at 200 Meister Avenue

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000119644
Chemical Name:	Propane
Flammable/Toxic:	Flammable
CAS Number:	74-98-6
Process ID:	1000112292
Description:	Warehouse Storage
Prevention Program Level 3 ID:	1000095820
NAICS Code:	325998
Prevention Program Chemical ID:	1000119646
Chemical Name:	Isobutane [Propane, 2-methyl]
Flammable/Toxic:	Flammable
CAS Number:	75-28-5
Process ID:	1000112292
Description:	Warehouse Storage
Prevention Program Level 3 ID:	1000095820
NAICS Code:	325998
Prevention Program Chemical ID:	1000119647
Chemical Name:	Difluoroethane [Ethane, 1,1-difluoro-]
Flammable/Toxic:	Flammable
CAS Number:	75-37-6
Process ID:	1000112292
Description:	Warehouse Storage
Prevention Program Level 3 ID:	1000095820
NAICS Code:	325998
Prevention Program Chemical ID:	1000119645
Chemical Name:	Butane
Flammable/Toxic:	Flammable
CAS Number:	106-97-8
Process ID:	1000112292
Description:	Warehouse Storage
Prevention Program Level 3 ID:	1000095820
NAICS Code:	325998

Prevention Program Chemical ID:	1000119648
Chemical Name:	Methyl ether [Methane, oxybis-]
Flammable/Toxic:	Flammable
CAS Number:	115-10-6

Process ID:	1000112292
Description:	Warehouse Storage
Prevention Program Level 3 ID:	1000095820
NAICS Code:	325998

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	03-Aug-2020

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	11-May-2020

The Technique Used

What If:	
Checklist:	
What If/Checklist:	Yes
HAZOP:	
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	31-Aug-2020

Major Hazards Identified

Toxic Release:	
Fire:	Yes
Explosion:	Yes
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	
Contamination:	
Equipment Failure:	
Loss of Cooling, Heating, Electricity, Instrument Air:	
Earthquake:	
Floods (Flood Plain):	
Tornado:	
Hurricanes:	
Other Major Hazard Identified:	

Process Controls in Use

Vents:	
Relief Valves:	
Check Valves:	
Scrubbers:	
Flares:	
Manual Shutoffs:	
Automatic Shutoffs:	
Interlocks:	
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	
Backup Pump:	
Grounding Equipment:	
Inhibitor Addition:	
Rupture Disks:	
Excess Flow Device:	
Quench System:	
Purge System:	
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	Yes
Dikes:	
Fire Walls:	Yes
Blast Walls:	
Deluge System:	
Water Curtain:	
Enclosure:	Yes
Neutralization:	
None:	
Other Mitigation System in Use:	

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	
Change Process Parameters:	
Installation of Process Controls:	
Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	
None Recommended:	
None:	Yes
Other Changes Since Last PHA or PHA Update:	

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	03-Aug-2020

Training

Training Revision Date (The date of the most recent review or revision of training programs):	10-Dec-2019

The Type of Training Provided

Classroom:	Yes
On the Job:	Yes
Other Training:	

The Type of Competency Testing Used

Written Tests:	Yes
Oral Tests:	
Demonstration:	
Observation:	
Other Type of Competency Testing Used:	

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	03-Aug-2020
Equipment Inspection Date (The date of the most recent equipment inspection or test):	18-Jul-2020
Equipment Tested (Equipment most recently inspected or tested):	LEL Detectors

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	17-Sep-2019
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	10-Dec-2019

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	30-Sep-2020

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	10-Dec-2019
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	31-Jan-2020

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	23-Jan-2020
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	23-Jan-2020

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	10-Dec-2019

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	24-Feb-2020

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	01-Jan-2020
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	31-Dec-2019

Confidential Business Information

CBI Claimed:

Section 8. Program Level 2

No records found.

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):	Yes
Facility Plan (Does facility have its own written emergency response plan?):	Yes
Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):	Yes
Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):	Yes
Healthcare (Does facility's ER plan include information on emergency health care?):	Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan):	10-Oct-2020

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees):	31-Dec-2019

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated):	Branchburg Township Fire Department
Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):	(908) 526-1300

Subject to

OSHA Regulations at 29 CFR 1910.38:	Yes
OSHA Regulations at 29 CFR 1910.120:	
Clean Water Regulations at 40 CFR 112:	
RCRA Regulations at CFR 264, 265, and 279.52:	
OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:	
State EPCRA Rules or Laws:	Yes
Other (Specify):	NJ TCPA rule

Executive Summary

1. Accidental Release Prevention Policies:

This facility handles Liquefied Petroleum Gases (propane, isobutane, normal butane, difluoroethane, and methyl ether) that are considered hazardous by the EPA. These are flammable gases, so it is necessary to follow safety precautions during handling to prevent human exposure and reduce health threats to our workers and the nearby community. Safety depends on:
(1) The manner in which we handle these products;
(2) The safety devices inherent in the design of the facility;
(3) Operating and maintenance procedures; and
(4) Employee training.

The President has overall authority for the safety program at the North Branch facility.

2. The Stationary Source and Regulated Substances handled:

The primary purpose of this facility is to receive and store Liquefied Petroleum Gases (propane, isobutane, normal butane, difluoroethane and methyl ether) and then use these materials as propellants in aerosol containers. These Liquefied Petroleum Gases are the only materials handled at the facility that are subject to the EPA's Risk Management Program Regulation.

3. The General Accidental Release Prevention Program and the Specific Prevention Steps:

The facility has a program level 3 accident release prevention program for the hydrocarbon systems that complies with OSHA's Process Safety Management Standard and EPA's Risk Management Program Regulation. The prevention program consists of the following elements:

(1) Employee Participation Program
(2) Process Safety Information
(3) Process Hazard Analysis
(4) Operating Procedures
(5) Training Program
(6) Contractor Safety Program
(7) Pre-Startup Safety Review Procedures
(8) Mechanical Integrity Program
(9) Hot Work Permit Procedures
(10) Management of Change Procedures
(11) Incident Investigation Procedures
(12) Compliance Audit Procedures
(13) Trade Secrets Procedures
(14) Management System

4. Five-Year Accident History
There have not been any accidents in the previous five years at the North Branch facility that resulted in significant on-site or offsite consequences.

5. The Emergence Action Program:
The emergency action plan for this facility consists of evacuating personnel to a designated assembly area. Our emergency action plan details employee actions and includes procedures for notification of the local Fire Department and the local LEPC. If the release is beyond the capabilities of facility personnel, representatives from the Fire Department would be called to respond to the incident.

The emergency action plan has been coordinated with the Fire Department.

6. Planned Changes to Improve Safety:

There are currently no planned changes to improve safety at the facility.